

### **REMARKS**

The applicant has carefully considered the official action mailed on February 28, 2007, and the reference cited therein. In the official action, claims 1-21 were rejected as anticipated by Kotaki. Reconsideration of this application is respectfully requested in view of the foregoing amendments and the following remarks.

By way of the foregoing amendments, claims 1, 8, and 15 have been amended and claims 22-24 have been added for consideration, leaving claims 1-24 pending in this application. No new matter has been added.

Independent claim 1 recites a method of generating embroidery data from image data involving generating occluded boundary information associated with a singular region, wherein the occluded boundary information represents a joining of at least two regular regions associated with the singular region. Kotaki does not describe or suggest the generation of occluded boundary information as recited in claim 1. While Kotaki does describe identification of branch points, which may be associated with singular regions within an image, and the generation of boundaries within such singular regions (e.g., the boundaries AD-P1, AE-P1, and AF-P1 of FIG. 4C) based on the branch points, these boundaries are not occluded boundaries, much less occluded boundary information that represents a joining of at least two regular regions associated with a singular region, as recited in claim 1. On the contrary, Kotaki describes generating boundaries within a singular region to separate or divide a singular region into a plurality of distinct regular regions. As shown in FIGS. 4A-4E, Kotaki divides the image A into three separate regions surrounding the singular region surrounding the branch point P1. Thus, the boundaries AD-P1, AE-P1, and

AF-P1 do not constitute occluded boundary information representing a joining of at least two regular regions of a singular region as recited in claim 1.

Thus, because Kotaki fails to disclose each and every limitation recited in claim 1, this claim is not anticipated thereby. Accordingly, the applicant respectfully submits that independent claim 1 and claims 2-7 and 22 dependent thereon are in condition for allowance.

The applicant respectfully submits that the remaining claims 8-21, 23, and 24 are also allowable for at least the reasons set forth above in connection with independent claim 1.

Thus, for at least the foregoing reasons, the applicant respectfully submits that all pending claims are now in condition for allowance. If there are any remaining issues in this application, the applicant urges the examiner to contact the undersigned attorney at the number listed below.

The Commissioner is authorized to charge any deficiency in the enclosed check toward payment of any fee due for the filing of this paper to deposit account number 50-2455.

Respectfully submitted,

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